

TECHNICAL BASIS FOR TIER I OPERATING PERMIT

DATE: November 4, 2002

PERMIT WRITER: Tom Anderson

PERMIT COORDINATOR: Bill Rogers

SUBJECT: AIRS Facility No. 027-00067, Teton Sales Co., Caldwell
Final Tier I Operating Permit

Permittee:	Teton Sales Co.
Permit Number:	027-00067
Air Quality Control Region:	064
AIRS Facility Classification:	A
Standard Industrial Classification:	2431
Zone:	11
UTM Coordinates:	524.0, 4834.7
Facility Mailing Address:	P.O. Box 177 Caldwell, ID 83606
County:	Canyon
Facility Contact Name and Title:	Harold Puri, Vice President
Contact Name Phone Number:	(208) 454-0359
Responsible Official Name and Title:	Harold Puri, Vice President
Exact plant Location:	518 and 604 Kit Ave., Caldwell, Idaho
General Nature of Business & Kinds of Products:	Coated doors and moldings for the manufactured home industry

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LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	best available control technology
Btu/hr	British thermal unit per hour
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated under the Idaho Administrative Procedures Act
lb/gal	pounds per gallon
lb/hr	pounds per hour
MACT	maximum available control technology
mmHg	millimeters of mercury
MMBtu/hr	million British thermal units per hour
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
TAPs	toxic air pollutants
T/yr	tons per year
VOC	volatile organic compounds

PUBLIC COMMENT/AFFECTED STATES/EPA REVIEW SUMMARY

A 30-day public comment period for the Teton Sales proposed Tier I operating permit was held from March 21, 2002 through April 22, 2002 in accordance with IDAPA 58.01.01.364 (*Rules for the Control of Air Pollution in Idaho*).

IDAPA 58.01.01.008.01, defines *affected states* as: "All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within fifty (50) miles of the Tier I source." A review of the site location information included in the permit application indicates that the facility is located within 50 miles of a state border. Therefore, the state of Oregon was provided an opportunity to comment on the draft Tier I permit.

Summary of Comments

The EPA submitted comments on the draft permit and technical memorandum on April 4, 2002. Those comments are provided, along with DEQ's responses, in Appendix C of this document.

A proposed was developed and submitted to EPA for their review. EPA provided no written objection to the proposed permit.

1. PURPOSE

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The Idaho Department of Environmental Quality (DEQ) staff has reviewed the information provided by Teton Sales Co. regarding the operation of its facility located in Caldwell, Idaho. This information was submitted based on the requirements to submit a Tier I permit in accordance with IDAPA 58.01.01.300.

Based on the information submitted, DEQ has drafted a Tier I permit for Teton Sales Co. A draft permit was submitted for public comment as required by IDAPA 58.01.01.364. Comments were provided by the EPA only. A proposed permit was then developed and submitted to the EPA for their review in accordance with IDAPA 58.01.01.366.

Teton Sales Co. has been identified as operating out of compliance for failure to obtain a permit to construct (PTC) for initial construction in 1976 and subsequent modifications. DEQ will resolve these compliance issues through the issuance of a Tier II permit. As required by IDAPA 58.01.01.314.10, a compliance schedule was developed and is included in the Tier I permit.

2. SUMMARY OF EVENTS

May 14, 1998	DEQ received a Tier I permit application from Teton Sales Co. for its door and molding coating facility located in Caldwell, Idaho. DEQ was unable to process the application at that time because of delinquent registration fees. DEQ received payment of registration fees October 14, 1998. The application was determined administratively complete November 13, 1998.
March 31, 2000	DEQ received additional information from Teton Sales Co. indicating that an emissions source present at the facility was not included in the Tier I permit application materials.
December 27, 2000	A Tier I permit for Teton Sales Co. was made available for public comment. The public comment period ended January 26, 2001. A problem with the compliance schedule contained in the permit was identified, and an extension of the permitting process was granted by DEQ on March 26, 2001.
August 14, 2001	An air quality inspection was conducted at Teton Sales Co. by DEQ staff during which numerous non-compliance issues were identified. On September 28, 2001, a warning letter was sent from DEQ to Teton Sales Co. formally notifying Teton Sales of its non-compliance status regarding the violations found during the August 14, 2001, inspection.
April 23, 2002	A public comment period was held from March 21, 2002, through April 22, 2002. No comments were received.

3. BASIS OF THE ANALYSIS

The following documents were relied upon in preparing this memorandum and the Tier I permit:

- Tier I permit application, received May 14, 1998, and supplemental application materials received March 31, 2000
- Air Quality Inspection Report dated August 14, 2001
- Letter from Thomas Krinke, Air Quality Science Officer, DEQ Boise Regional Office, dated September 28, 2001
- Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, January 1995, Office of Air Quality Planning and Standards, EPA
- Guidance developed by the EPA and DEQ
- Title V permits issued by other jurisdictions
- 40 CFR Parts 52 and 70
- Information in the DEQ source file

4. FACILITY DESCRIPTION

4.1 General Process Description

The building at 518 Kit Ave. (Building No. 1) houses the door-coating line and a molding-coating line. Doors are hand-attached to hangers that are mechanically conveyed along a suspended rail through the spray booth where workers spray coat the doors with hand-held, high-volume low-pressure spray guns that have a transfer efficiency of 50%. The spray booth is a wide, ventilated enclosure that draws air past the spraying activity through a fiberglass particulate filter. The filter has a particulate matter removal efficiency of 90%. Filtered air is exhausted through a roof vent at a rate of 25,000 cubic feet per minute (cfm). After coating, doors are cured on the hangers, then routed through a 0.28 million British thermal units per hour (MMBtu/hr) natural gas-fired drying oven. The door coating line was constructed in November of 1995.

The molding-coating operations in Building No. 1 consists of a fan coater with a ventilation hood that lays coating onto the molding, and a roll coater that rolls a sealer onto the molding. The fan coating head discharges a fan-shaped curtain of coating through which the pieces of molding are conveyed. Molding is conveyed from the fan coater to the oven for drying. Emissions are captured by a ventilation hood and ducted through a wall vent at 1,000 cfm. After drying, a sealer is applied with the roll coater. After sealing, the molding is sent to the oven for drying. Neither the fan coater nor the roll coater generate particulate matter emissions. This fan coater was installed in 1990. The roll coater was installed in late 1999 or early 2000.

The building at 604 Kit Ave. (Building No. 2) houses molding-coating and printing operations. The molding-coating operations consist of three fan coaters, and one roll coater. The fan coating head discharges a fan-shaped curtain of coating through which the pieces of molding are conveyed. Molding is conveyed from the fan coater to a 0.38 MMBtu/hr natural gas-fired oven for drying. The roll coater applies a sealer material to some of the molding. After application, the molding is conveyed to the dryer. Neither the fan coater nor the roll coater generate particulate matter emissions. Volatile organic compound emissions from the fan coaters are captured by ventilation hoods, and are vented through the wall or through the roof. The roll coater was constructed in 1990, two fan coaters were constructed in 1976, and the other fan coater was constructed in 1995.

After the molding has been coated, it can be run through one of the rotogravure ink printers. The printers can imprint a woodgrain pattern such as oak or pine on the molding. Depending on the type of molding being patterned, each piece can be routed through the printer up to three times. There are no particulate matter emissions generated by the ink printers. Volatile organic compound emissions from the printers are captured by ventilation hoods, and are ducted through the wall.

The facility also includes a 3,000-gallon acetone storage tank, a 2,500 T-6 (a thinner) storage tank, numerous portable storage tanks, and a paint mixing area.

4.2 Facility Classification

The facility is classified as a major facility, in accordance with IDAPA 58.01.01.008.10, because the facility emits or has the potential to emit a regulated criteria air pollutant in amounts greater than or equal to 100 tons per year (T/yr). The facility is also a major facility as defined by IDAPA 58.01.01.008.10 because the facility emits or has the potential to emit a regulated hazardous air pollutant (HAP) in amounts greater than or equal to 10 T/yr, or emits or has the potential to emit a combination of HAPs in amount greater than or equal to 25 T/yr. The facility is not a designated facility as defined by IDAPA 58.01.01.006.27. The facility is a major facility as defined by IDAPA 58.01.01.006.55 and by 40 CFR 52.21, and is subject to Prevention of Significant Deterioration (PSD) permitting requirements, because the facility emits or has the potential to emit are regulated criteria air pollutant in amounts greater than or equal to 250T/yr. The facility is not subject to any federal New Source Performance Standards (NSPS) in accordance with 40 CFR Part 60, National Emission Standards for Hazardous Air Pollutants (NESHAP) in accordance with 40 CFR Part 61, or NESHAP for Source Categories in accordance with 40 CFR Part 63. The Standard Industrial Classification code defining the facility is 2431 (Lumber and Wood Products Except Furniture - Millwork) and the facility classification is A.

4.3 Area Classification

Teton Sales Co. is located in Caldwell, Idaho, which is located in Canyon County. Canyon County is located in Air Quality Control Region 64 and Universal Transverse Mercator Zone 11. The area is designated as an attainment or unclassifiable area for all regulated criteria air pollutants. There are no Class I areas located within 10 kilometers of the facility.

4.4 Permitting History

The Teton Sales Co. facility began operating in 1976. Several modifications to the facility have been made since then. No construction permit applications were submitted for DEQ review prior to construction of any processes currently in operation. On September 28, 2001, Teton Sales was sent a warning letter by DEQ based on an August 14, 2001, DEQ inspection. The warning letter informed the facility that it was operating out of compliance with the *Idaho Rules for Control of Air Pollution in Idaho* for failure to obtain a PTC for initial construction and all subsequent modifications, and 40 CFR 52.21, *Prevention of Significant Deterioration of Air Quality*. See section 10 for discussion of the compliance schedule for this source.

4.5 Emissions Description

Emissions at the Teton Sales Co. result from door and molding-coating operations. These operations include spray coating, fan coating, roll coating, and printing. Lesser quantities of emissions result from natural gas-fired combustion sources and handling and storing solvents. Appendix A contains a summary of the potential to emit volatile organic compounds (VOCs) for each process. Appendix B contains a summary of the potential to emit HAPs for each process. Emissions units affected only by general applicable requirements are discussed below.

4.5.1 Drying Oven Heaters

This facility includes five natural gas-fired space heaters that are located within Building No. 1 and Building No. 2. The heaters provide process heat for the ovens used to dry coated doors and

molding. In accordance with IDAPA 58.01.01.317.01.b.i.(5), combustion sources using natural gas, propane, or kerosene and generating less than 5.0 MMBtu/hr are identified as insignificant activities for the purposes of the Tier I operating permit program. Therefore, these heaters are not specifically limited in the operating permit drafted for this facility.

4.5.2 Solvent Storage Tanks

Two liquid storage tanks are located at the facility. A 3,000-gallon storage tank is used to store acetone, and the other is a 2,500-gallon storage tank containing T-6 thinner. T-6 is a mixture of 50% toluene, 33% acetone, 12% methyl isobutyl ketone, and 5% methanol. In accordance with IDAPA 58.01.01.317.01.b.i.(3), operation, loading, and unloading of VOC storage tanks, with appropriate closure and containing VOC of vapor pressure not greater than 80 millimeters of mercury (mmHg) at 21°C, are identified as insignificant activities. Although the vapor pressure of methanol is 98 mmHg at 20°C, the vapor pressure of the mixture is well below the 80 mmHg threshold.

5. REGULATORY ANALYSIS - FACILITY-WIDE APPLICABLE REQUIREMENTS

5.1 Facility-wide Applicable Requirements

5.1.1 Fugitive Particulate Matter - IDAPA 58.01.01.650-651

5.1.1.1 Requirement

Facility-wide Permit Condition 2.1 states that all reasonable precautions shall be taken to prevent particulate matter from becoming airborne in accordance with IDAPA 58.01.01.650-651.

5.1.1.2 Compliance Demonstration

Facility-wide Permit Condition 2.2 states that the permittee is required to monitor and maintain records of the frequency and the methods used by the facility to reasonably control fugitive particulate emissions. IDAPA 58.01.01.651 gives some examples of ways to reasonably control fugitive emissions, which include using water or chemicals, applying dust suppressants, using control equipment, covering trucks, paving roads or parking areas, and removing materials from streets.

Facility-wide Permit Condition 2.3 requires that the permittee maintain a record of all fugitive dust complaints received. In addition, the permittee is required to take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The permittee is also required to maintain records that include the date each complaint was received, a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

To ensure the methods being used by the permittee reasonably control fugitive emissions, whether or not a complaint is received, Facility-wide Permit Condition 2.4 requires the permittee conduct periodic inspections of the facility. The permittee is required to inspect potential sources of fugitive emissions during daylight hours and under normal operating conditions. If the permittee determines that the fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee is also required to maintain records of the results of each fugitive emissions inspection.

Facility-wide Permit Conditions 2.3 and 2.4 require the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes taking corrective action within 24 hours of receiving a valid complaint or determining that fugitive emissions are not being reasonably controlled meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.2 Control of Odors - IDAPA 58.01.01.775-776

5.1.2.1 Requirement

Facility-wide Permit Condition 2.5 and IDAPA 58.01.01.776 both state: *"No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids to the atmosphere in such quantities as to cause air pollution."* This condition is currently considered federally enforceable until such time it is removed from the State Implementation Plan (SIP), at which time it will be a state-only enforceable requirement.

5.1.2.2 Compliance Demonstration

Facility-wide Permit Condition 2.6 requires the permittee to maintain records of all odor complaints received. If the complaint has merit, the permittee is required to take appropriate corrective action as expeditiously as practicable. The records are required to contain the date each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Facility-wide Permit Condition 2.6 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid odor complaint meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.3 Visible Emissions - IDAPA 58.01.01.625

5.1.3.1 Requirement

IDAPA 58.01.01.625 and Facility-wide Permit Condition 2.7 state *"(No) person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined . . ."* by IDAPA 58.01.01.625. This provision does not apply when the presence of uncombined water, nitrogen oxides (NO_x), and/or chlorine gas are the only reason(s) for the failure of the emissions to comply with the requirements of this rule.

5.1.3.2 Compliance Demonstration

To ensure reasonable compliance with the visible emissions rule, Facility-wide Permit Condition 2.8 requires that the permittee conduct routine visible emissions inspections of the facility. The permittee is required to inspect potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection consists of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission covered by this section, the permittee must either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is determined to be greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee must take corrective action and report the exceedance in its annual compliance certification and in accordance with the excess emissions rules in IDAPA 58.01.01.130-136. The permittee is also required to maintain records of the results of each visible emissions inspection and each opacity test, when conducted. These records must include the date of each inspection, a description of the permittee's assessment of the conditions existing at the time visible emissions are present, any corrective action taken in response to the visible emissions, and the date corrective action was taken.

It should be noted that if a specific emissions unit has a specific compliance demonstration method for visible emissions that differs from Facility-wide Permit Condition 2.8, then the specific compliance demonstration method overrides the requirement of Condition 2.8. Condition 2.8 is intended for small sources that would generally not have any visible emissions.

Facility-wide Permit Condition 2.8 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of discovering visible emissions meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.4 Startup, Shutdown, Scheduled Maintenance, Safety Measures, Upset, and Breakdown-IDAPA58.01.01.130-136

5.1.4.1 Requirement

Facility-wide Permit Condition 2.9 requires that the permittee comply with the requirements of IDAPA 58.01.01.130-136 for startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns. This section is fairly self-explanatory and no additional detail is necessary in this technical analysis. However, it should be noted that subsections 133.02, 133.03, 134.04, and 134.05 are not specifically included in the permit as applicable requirements. These provisions of the *Rules* only apply if the permittee anticipates requesting consideration under subsection 131.02 of the *Rules* to allow DEQ to determine if an enforcement action to impose penalties is warranted. Section 131.01 states "... The owner or operator of a facility or emissions unit generating excess emissions shall comply with Sections 131, 132, 133.01, 134.01, 134.02, 134.03, 135, and 136, as applicable. If the owner or operator anticipates requesting consideration under Subsection 131.02, then the owner or operator shall also comply with the applicable provisions of Subsections 133.02, 133.03, 134.04, and 134.05." Failure to prepare or file procedures pursuant to Sections 133.02 and 134.04 is not a violation of the *Rules* in and of itself, as stated in subsections 133.03.a and 134.06.b. Therefore, since the permittee has the option to follow the procedures in Subsections 133.02, 133.03, 134.04, and 134.05, and is not compelled to, the subsections are not considered applicable requirements for the purpose of this permit and are not included as such.

5.1.4.2 Compliance Demonstration

The compliance demonstration is contained within the text of Facility-wide Permit Condition 2.9. No further clarification is necessary here.

5.1.5 Excess Emissions

Teton Sales has not identified any circumstances for startup, shutdown, or maintenance that would create excess emissions. This permitting action does not include any review and incorporation of excess emissions plans in the permit.

5.1.6 Open Burning

See Facility-wide Permit Condition 2.12.

5.1.7 Renovation/Demolition

See Facility-wide Permit Condition 2.13.

5.1.8 Chemical Accident Prevention Provisions

See Facility-wide Permit Condition 2.14.

5.1.9 Recycling and Emission Reductions

See Facility-wide Permit Condition 2.18.

5.1.10 Fuel-burning Equipment

See Facility-wide Permit Condition 2.17.

5.1.11 Fuel Sulfur Content

Teton Sales is not authorized to use any liquid fuel subject to fuel-sulfur content regulation under IDAPA 58.01.01.728.

5.1.12 NSPS

Teton Sales is not subject to any subpart of 40-CFR Part 60.

5.1.13 Compliance Testing

See Facility-wide Permit Condition 2.16.

5.1.14 Test Methods

See Facility-wide Permit Condition 2.15.

5.1.15 Reports and Certifications

See Facility-wide Permit Condition 2.10.

5.1.16 Monitoring and Recordkeeping

See Facility-wide Permit Condition 2.11.

6. REGULATORY ANALYSIS- EMISSIONS UNITS

6.1 EMISSIONS UNIT NUMBER 1 – DOOR-COATING OPERATIONS, BUILDING NO. 1

6.1.1 Emissions Unit Description

The door-coating operations are located in Building No. 1 at 518 Kit Ave. Regulated air pollutant emissions sources include the door-coating line spray booth, drying oven, and building fugitives emitted during handling of freshly coated doors. Mixing of coatings to be used in the door-coating line are conducted in Building No. 2 and are also included with this emissions unit, as are emissions from clean-up with T-6 thinner. Emissions from the spray booth and the oven are each vented to the atmosphere through separate stacks. Other sources associated with Emissions Unit No. 1 are emitted as building fugitives.

SPRAY BOOTH

Doors attached to hangers are mechanically conveyed along a suspended rail past the spray booth where workers spraycoat the doors with water-based or solvent-based coatings. Spray coating is conducted using hand-held, air-assisted airless spray guns with a reported transfer efficiency of 50%.

The spray booth is a wide ventilated booth that draws air past the spraying activity through a fiberglass filter. The filter system was designed and built by Teton Sales Co. and performance criteria have not been established for the filters. The permittee has claimed a particulate control efficiency of 90 % for the filter system. Exhaust air from the spray booth is discharged to the atmosphere at a flow rate of approximately 25,000 acfm.

DRYING OVEN

Doors are routed through a heated drying oven after approximately 1.5 hours of curing. The oven is a paneled, ventilated enclosure with two natural gas-fired heaters (0.140 MMBtu/hr heat input for each heater). The oven operates at 120°F to 150°F. Emissions are vented directly to the atmosphere via four blowers at a combined rate of 5,000 acfm. Emissions from the oven are uncontrolled. The

drying-oven heating units are listed as an insignificant activity for Title V permitting purposes under IDAPA 58.01.01.317.b.i.5.

6.1.2 Permit Limits

Teton Sales has no air quality permit for the door-coating line. The applicable requirements for this process are IDAPA 58.01.01.625, 700.02, 702, as summarized in Table 1.

Table 6.1. Door-Coating Line Emissions Summary

PARAMETER	PERMIT LIMIT SUMMARY	APPLICABLE REQUIREMENTS REFERENCE
PM	1.0 lb/hr	IDAPA 58.01.01.700.02, 702
Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625

6.1.2.1 Process Weight

Particulate matter emissions from the door-coating operations were estimated using information supplied by Teton Sales in their Tier I permit application. The average application rate indicated is 15 gal/hr; however, Teton Sales has requested that amount be increased by 20%, or up to 18 gal/hr, to allow for operational flexibility. No enforceable limit currently applies to the coating operation. The density of the coating used in the process is 8.61 lb/gal. The equivalent mass of coating applied per hour is determined by the following:

$$(8.61 \text{ lb/gal}) \times (18 \text{ gal/hr}) = 155.0 \text{ lb/hr}$$

Potential PM emissions from the currently filtration system are calculated using the following data:

- mass of coating applied = 155.0 lb/hr
- coating transfer efficiency = 50%
- coating solids content = 40%
- PM filter capture efficiency = 90%

$$\text{PM emissions} = (155.0 \text{ lb/hr}) \times (1.0 - 0.50) \times (0.4) \times (1.0 - 0.90) = 3.1 \text{ lb/hr}$$

The mass of coating applied, 155.0 lb/hr, represents the process weight of the door-coating operation. The applicable regulatory process weight requirement is IDAPA 58.01.01.702.01. This regulation states: *No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, particulate matter in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:*

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

The process weight of the door-coating operation is less than 17,000 lb/hr; therefore, the appropriate process weight PM emissions limitation equation is a, or $E = 0.045(PW)^{0.6}$. Performing the calculation yields the allowable emissions:

$$E = 0.045(155)^{0.6}$$

$$E = 0.93 \text{ lb/hr}$$

In accordance with IDAPA 58.01.01.700.02, "... no source shall be required to meet an emission limit of less than one (1) pound per hour." Because no source is required to meet an emission limit of less than 1.0 lb/hr, the emission limitation for this process is 1.0 lb/hr.

As shown above, the current filtration systems PM emissions are estimated to be 3.1 lb/hr. The current system does not demonstrate compliance with the process weight regulation (IDAPA 58.01.01.702). Upon discussions between DEQ and Teton Sales, the easiest solution to the compliance problem is to install filters having a greater PM capture efficiency. Teton Sales has proposed to install filters with a minimum capture efficiency of 99%. With these filters installed, operated, and properly maintained, estimated PM emissions comply with the applicable process weight requirement (IDAPA 58.01.01.702) as shown in the following equation:

$$(155.00 \text{ lb/hr}) \times (1.0 - 0.50) \times (1.0 - 0.6) \times (1.0 - .99) = 0.31 \text{ lb/hr}$$

To assure reasonable compliance with IDAPA 58.01.01.702, the permit contains the following requirements:

- Install, calibrate, maintain, and operate, in accordance with manufacturer specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the door-coating spray booth filtration system. Record the pressure daily and retain the pressure drop records for five years.
- Install particulate matter filters with minimum capture efficiency of 99%.
- Determine the appropriate pressure drop operating range for the spray booth filtration system based on the system's physical characteristics, the air flow rate through the system, and the particulate matter filter manufacturer specifications and recommendations.
- Incorporate the pressure drop operating range into the modified Tier I operating permit that is a result of the compliance schedule in the permit.
- Limit PM emissions to 1.0 lb/hr.
- Limit coating throughput to 18 gal/hr.
- Develop an O&M manual containing the following minimum requirements: a general description of the spray booth and its ventilation system
 - the normal operating conditions and procedures
 - the appropriate pressure drop operating range
 - particulate matter filter manufacturer documentation verifying a minimum capture efficiency of 99%
 - vendor documentation of the filter efficiency is to be part of the O&M manual
 - maintenance procedures
 - corrective action procedures

Monitor and record the amount of coating used.

6.1.3 Monitoring, Recordkeeping, and Reporting

All monitoring and recordkeeping requirements mandated by this Tier I operating permit shall comply with Permit Condition 2.11. All reporting requirements mandated by this Tier I operating permit shall comply with Permit Condition 2.10 and General Provision 24.

6.2 EMISSIONS UNIT NUMBER 2 – MOLDING-COATING OPERATIONS, BUILDING NO. 1

6.2.1 Emissions Unit Description

The molding-coating operations in Building No. 1 consist of a fan coater with a ventilation hood that lays coating onto the molding, and a roll coater which rolls a sealer onto the molding. The fan coating head discharges a fan-shaped curtain of coating through which the pieces of molding are conveyed. Molding is conveyed from the fan coater to the same oven described in the door coating line for drying. VOC emissions are captured by a ventilation hood, and are ducted through a wall vent at 1,000 cfm. After drying, a sealer is applied with the roll coater. After sealing, the molding is sent to the oven for drying. Particulate emissions are not generated by the fan coater or the roll coater. The fan coater was installed in 1990. The roll coater was installed in late 1999, or early 2000.

6.2.2 Permit Limits

The only emissions generated by the molding-coating operation are VOCs. There are no VOC emissions limitations for Teton Sales. The only applicable requirement for the molding-coating operation is visible emissions in accordance with IDAPA 58.01.01.625. This requirement limits visible emissions from any stack, vent, or other functionally equivalent opening associated with the molding-coating operations in Building No. 1 to no more than 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period.

6.2.3 Monitoring, Recordkeeping, and Reporting

All monitoring and recordkeeping requirements mandated by this Tier I operating permit shall comply with Facility-wide Permit Condition 2.11. All reporting requirements mandated by this Tier I operating permit shall comply with Facility-wide Permit Condition 2.10 and General Provision 24.

6.3 EMISSIONS UNIT NUMBER 3 – MOLDING-COATING OPERATIONS BUILDING No. 2

6.3.1 Emissions Unit Description

The building at 604 Kit Avenue (Building No. 2) houses molding-coating and printing operations. The molding-coating operations consist of three fan coaters, and one roll coater. The fan coating head discharges a fan shaped curtain of coating through which the pieces of molding are conveyed. Molding is conveyed from the fan coater to the oven for drying. The drying oven consists of two 0.14 MMBtu/hr and one 0.10 MMBtu/hr natural gas-fired heaters. The roll coater applies a sealer material to some of the molding. After application, the molding is conveyed to the dryer. Particulate emissions are not created by the fan coaters, or the roll coater. VOC emissions from the fan coaters are captured by ventilation hoods, and are vented through the wall, or through the roof. The roll coater was constructed in 1990, two fan coaters were constructed in 1976, and a third fan coater was constructed in 1995.

6.3.2 Permit Limits

The only emissions generated by molding printing are VOCs. There are no limitations on VOC emissions at Teton Sales. The only applicable requirement for the molding-coating operation is visible emissions in accordance with IDAPA 58.01.01.625. This requirement limits visible emissions from any stack, vent, or other functionally equivalent opening associated with the molding-coating operations in Building No. 2 to no more than 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period.

6.3.3 Monitoring, Recordkeeping, and Reporting

All monitoring and recordkeeping requirements mandated by this Tier I operating permit shall comply with Facility-wide Permit Condition 2.11. All reporting requirements mandated by this Tier I operating permit shall comply with Facility-wide Permit Condition 2.10 and General Provision 24.

6.4 EMISSIONS UNIT NUMBER 4 – MOLDING-PRINTING OPERATIONS BUILDING No. 2

6.4.1 Emissions Unit Description

After the molding has been coated, it is run through one of two rotogravure ink printers. The printers imprint a woodgrain pattern such as oak or pine on the molding. Depending on the type of molding being patterned, each piece can be routed through the printer up to three times. There are no particulate emissions generated by the ink printers. Volatile organic compound (VOC) emissions from the printers are captured by ventilation hoods, and are ducted through the wall. Printer No. 1 was installed in June 1980. Printer No. 2 was installed in June 1990.

6.4.2 Permit Limits

The only emissions generated by molding-printing are VOCs. There are no limitations on VOC emissions at Teton Sales. The only applicable requirement for the molding-coating operation is visible emissions in accordance with IDAPA 58.01.01.625. This requirement limits visible emissions from any stack, vent, or other functionally equivalent opening associated with the molding-printing operations in Building No. 2 to no more than 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period.

6.4.3 Monitoring, Recordkeeping, and Reporting

All monitoring and recordkeeping requirements mandated by this Tier I operating permit shall comply with Facility-wide Permit Condition 2.11. All reporting requirements mandated by this Tier I operating permit shall comply with Facility-wide Permit Condition 2.10 and General Provision 24.

7. INSIGNIFICANT ACTIVITIES

Listed below are the insignificant activities described by the source in accordance with IDAPA 58.01.01.317.

Table 7.1. Insignificant Activities

Description	Insignificant Activities Section Citation IDAPA 58.01.01.317.b.i.3
2,500 gallon T-6 storage tank	58.01.01.317.b.i.3
3,000 gallon acetone storage tank.	58.01.01.317.b.i.3
280,000 Btu/hr natural gas oven heaters - Building No. 1	58.01.01.317.b.i.5
380,000 Btu/hr natural gas oven heaters - Building No. 2	58.01.01.317.b.i.5
Building No. 1 and No. 2 – Portable Totes and Drums	58.01.01.317.a.i.37

8. ALTERNATIVE OPERATING SCENARIOS

No alternative operating scenarios were identified by Teton Sales in the application materials.

9. TRADING SCENARIOS

No trading scenarios were proposed by Teton Sales in the application materials.

10. COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION

Pursuant to the information submitted by Teton Sales in the May 14, 1998 Tier I operating permit (Tier I) application and as confirmed by an August 14, 2001 air quality inspection, Teton Sales has not obtained permits to construct (PTCs) for construction and/or modification of all emission sources at the facility in accordance with IDAPA 58.01.01.200 through 223. The following sources were specifically identified that were required to, but did not obtain, a PTC:

Building No. 1:

- Molding-coating operations, 1 fan coater and drying oven, constructed in January 1990
- Molding-coating operations, 1 roll coater, constructed in late 1999 or early 2000
- Door-coating operations, all emissions units, constructed in November 1995

Building No. 2:

- Molding-coating operations, 2 fan coaters (Nos. 1 and 2) and drying oven, constructed in 1976
- Molding-coating operations, 1 fan coater (No. 3), constructed in June 1995
- Molding-coating operations, 1 roll coater, constructed in January 1990
- Molding-printing operations, No. 1 rotogravure ink printer, constructed June 1980
- Molding-printing operations, No. 2 rotogravure ink printer, constructed June 1990

In addition, the permittee has the continuing responsibility to submit any supplementary information needed, including information on any other sources, in accordance with IDAPA 58.01.01.315.

Because these sources have been constructed and/or modified without a permit, the Department has determined that the most appropriate course of action to bring the facility into compliance with the requirements is to issue a single facility-wide permit that:

- a. specifically establishes the operating terms and conditions required by the PTC rules for sources for which a permit was required but not obtained; and
- b. collectively addresses the operating terms and conditions required to demonstrate that emissions from all sources at the facility will not contribute to the violation of an applicable standard.

The Department is, therefore, requiring a combined Tier II operating permit (Tier II) and PTC (hereafter referred to as the facility-wide permit). The Tier II for Teton Sales is required in accordance with IDAPA 58.01.01.401.03 based on the determination that specific emission standards, or requirements on operation or maintenance are necessary to ensure compliance with any applicable emission standard or rule. The facility-wide permit will contain the terms and conditions necessary for the facility to comply with the applicable requirements of IDAPA 58.01.01.400 through 410.

The facility-wide permit will also include all of the terms and conditions for new or modified sources. For those sources within the facility that have existing PTCs, the terms and conditions will be incorporated into the new permit. For sources at the facility for which a PTC was required but not obtained, the permit will establish new emission limits, controls, and other requirements in accordance with the applicable portions of IDAPA 58.01.01.200 through 223. The new facility-wide permit will address all applicable emission standards, required emission control technology, and demonstrate that the facility will not cause or contribute to any ambient air quality standard or applicable prevention of significant deterioration (PSD) increment.

The combined Tier II and PTC is different than, and separate from, the Tier I in that the new permit will establish new applicable emission limits, controls, and other requirements that are as stringent as the requirements contained in or enforceable under the state implementation plan. This permit will create new underlying requirements for sources that are in existence at the time the initial Tier I is

issued. A Tier I permit modification will, therefore, need to be issued concurrently with the issuance of the new facility-wide permit.

The applicable requirements established in the facility-wide permit pursuant to IDAPA 58.01.01.200 through 223 shall be clearly identified as such in the permit and shall remain in full force and effect until such time as they are modified or terminated in accordance with the procedures for issuing a PTC.

The specific compliance schedule elements and milestones to achieve compliance are described below.

Permit Condition 7.2. The permittee will be required to submit a complete permit application with all supporting information and documentation for issuance of a facility-wide permit in accordance with IDAPA 58.01.01.400 through 410 no later than 180 days from the final issuance date of the Tier I. A facility-wide permit is required by the Department to establish the terms and conditions necessary to comply with an applicable rule or standard. The Department shall consider the emissions from all sources at the facility and the specific requirements for individual sources in preparing the facility-wide operating permit.

The permit application shall clearly identify all emissions units at the facility—listing currently permitted emissions units, exempted units for which the facility maintains exemption documentation, units constructed before and not modified since January 24, 1969, and units constructed and/or modified since January 24, 1969 without a permit or construction approval from the Department. Application information shall provide facility information and emissions data for all emissions units in accordance with IDAPA 58.01.01.402 and 403 and shall include a demonstration that the sources at the facility will not cause or significantly contribute to a violation of the NAAQS or of any applicable PSD increment.

The application submittal deadlines have been set to reasonably accommodate updating and organizing the emissions unit descriptions and emissions data, and conducting ambient air quality modeling for all sources. Applications that are deemed or remain incomplete beyond the 180-day milestone shall constitute a violation of this permit condition.

Permit Condition 7.3. In addition to the information submitted under Permit Condition 7.2, the permittee is required to submit all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 for the construction and/or modification of sources for which the permittee was required but did not obtain a PTC. The information must include all information to address the additional permit requirements for new major facilities or major modifications where construction without enforceable limits may have triggered PSD or nonattainment new source review (NSR) requirements.

This data must be submitted with the complete permit application required under Permit Condition 7.2 in order to issue a single combined permit. The information is, therefore, due no later than 180 days from the final issuance date of the Tier I. Failure to include complete information for addressing the PTC requirements within the required timeframe shall constitute a violation of this permit condition.

Permit Condition 7.4. If through the development of the facility-wide permit, any other source or sources are identified that should have obtained a PTC or PTC modification and for which the applicant did not include the information under Permit Condition 7.3, a supplemental application that contains all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 shall be submitted no later than 30 days after receiving written notification from the Department. Supplemental applications that are deemed or remain incomplete beyond the 30-day milestone shall constitute a violation of this permit condition.

Permit Condition 7.5. If the permittee can clearly demonstrate that the data required for the facility-wide permit cannot be collected and organized within the specified timeframe, the permit application submittal deadlines may be extended at the discretion of the Department for a specific time period not to exceed one year. For the Department to consider a request for an extension without jeopardizing the terms and conditions of the permit, the request must be submitted by the facility no later than the

midpoint of the compliance milestone timeline. The request must be submitted in writing with a clear demonstration why the data cannot reasonably be submitted within the specified timeframe. An example of information that might justify an extension is the absence of ambient monitoring data required to complete a PSD application.

The Department will review the request and the justification and approve or disapprove the extension in writing. The responsibility for meeting the schedule if the Department has not issued a written extension belongs to the permittee.

Permit Condition 7.6. The Department intends to draft and issue a single facility-wide permit to bring the permittee back into compliance. This permit will fully meet all of the applicable requirements in the *Rules* and the federally approved state implementation plan. Because the permit will contain both elements of PTCs and of Tier II permits, it will clearly identify the origin and basis for each term and condition. The terms and conditions established pursuant to the PTC requirements shall be clearly marked and shall not expire with any Tier II operating permit term. The terms and conditions established pursuant to the Tier II requirements shall be clearly marked and shall be implemented in accordance with the Tier II process. The procedures for issuing a PTC in IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II in IDAPA 58.01.01.404. The permit shall clearly state that any future modification of a term or condition in the permit shall be subject to the appropriate procedural requirements on which the original term or condition was based.

Permit Condition 7.7. Within 90 days of issuance of the Tier I operating permit, the permittee shall have installed particulate matter filters with a minimum capture efficiency of 99%, and determined the appropriate pressure drop operating range for the door-coating spray booth filtration system in Building No. 1. Particulate matter vendor documentation verifying a minimum capture efficiency of 99%, and the appropriate pressure drop operating range shall be incorporated into the O&M manual required by Permit Condition 3.7. Upon issuance of the modified permit resulting from this compliance schedule, the pressure drop operating range shall be incorporated into the modified permit as a federally enforceable permit condition.

Permit Condition 7.8. Within 30 days after the facility-wide permit application is determined complete by the Department, the permittee will need to request a significant permit modification to the Tier I in accordance with IDAPA 58.01.01.382.02. A significant Tier I modification will require the payment of fees in accordance with IDAPA 58.01.01.389.06.b.iii. Because the information in a complete application as required under Permit Condition 7.2 and 7.3 should contain all of the technical information necessary to modify the Tier I, the Department may waive portions of the standard application requirements as appropriate provided the permittee certifies the completeness, truth, and accuracy of all documents submitted.

The Tier I modification shall be processed concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I in IDAPA 58.01.01.360 through 369.

Permit Condition 7.9. The permittee shall be required to submit a progress report at the end of each calendar quarter (January 1, April 1, July 1, and October 1) of each year stating when each of the conditions of each milestone were or will be achieved. A detailed explanation is required when milestones were not or will not be achieved in accordance with the schedule.

Permit Condition 7.10. The incorporation of the compliance schedule into the Tier I operating permit does not sanction noncompliance with the applicable rules.

11. ACID RAIN PERMIT

Teton Sales is not subject to the Acid Rain permitting requirements of 40 CFR Parts 72 through 75.

12. AIRS DATABASE

AIRS/AFS FACILITY-WIDE CLASSIFICATION DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	B						U
No _x	B						U
CO	B						U
PM ₁₀	B						U
PM	B						U
VOC	A	A				A	U
Total HAPs	A					A	U
APPLICABLE SUBPART							

AIRS Facility Subsystem

AIRS/AFS CLASSIFICATION CODES:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

13. REGISTRATION FEES

Teton Sales is a major facility as defined by IDAPA 58.01.01.008.10, and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387.

14. RECOMMENDATION

Based on the Tier I operating permit application and review of the federal regulations and state rules, staff recommends that final Tier I operating permit No. 027-00067 be issued to Teton Sales Co. for their Caldwell facility.

TA\sm T1-9805-167-1 AIR.SSTV.V054.0402.470

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APPENDIX A
VOC POTENTIAL TO EMIT

Volatile Organic Compounds - Moulding Coating Lines

Fan Coater - 518 Kit Avenue

Production Rate (gal/hour) =	13.75	VOC Emissions	
Paint Density (lb/gal) =	10.84	(lb/hr)	(T/yr)
Maximum VOC content (%) =	39.6	59.0	256.5

Roll Coater #1 - 604 Kit Avenue

Production Rate (gal/hour) =	5	VOC Emissions	
Paint Density (lb/gal) =	9.37	(lb/hr)	(T/yr)
Maximum VOC content (%) =	53.7	25.2	110.2

Printer #1 - 604 Kit Avenue

Production Rate (gal/hour) =	6.25	VOC Emissions	
Paint Density (lb/gal) =	7.71	(lb/hr)	(T/yr)
Maximum VOC content (%) =	63.9	30.8	134.9

Printer #2 - 604 Kit Avenue

Production Rate (gal/hour) =	6.25	VOC Emissions	
Paint Density (lb/gal) =	7.71	(lb/hr)	(T/yr)
Maximum VOC content (%) =	63.9	30.8	134.9

Fan Coater #1 - 604 Kit Avenue

Production Rate (gal/hour) =	13.75	VOC Emissions	
Paint Density (lb/gal) =	9.89	(lb/hr)	(T/yr)
Maximum VOC content (%) =	45.6	62.0	271.6

Fan Coater #2 - 604 Kit Avenue

Production Rate (gal/hour) =	8.25	VOC Emissions	
Paint Density (lb/gal) =	7.36	(lb/hr)	(T/yr)
Maximum VOC content (%) =	71.5	33.0	144.4

Fan Coater #3 - 604 Kit Avenue

Production Rate (gal/hour) =	13.75	VOC Emissions	
Paint Density (lb/gal) =	9.1	(lb/hr)	(T/yr)
Maximum VOC content (%) =	53.1	66.4	281.0

Roll Coater #2 - 518 Kit Avenue

Production Rate (gal/hour) =	5	VOC Emissions	
Paint Density (lb/gal) =	9.37	(lb/hr)	(T/yr)
Maximum VOC content (%) =	53.7	25.2	110.2

Volatile Organic Compound Emissions- Door Coating

Emission Unit	Potential VOC's Emissions (lb/hr)	Potential VOC's Emissions (T/yr)
Door Coating Line	72.0	315.4

Volatile Organic Compound Emissions- Facility Total Potential to Emit

Emission Unit	Potential VOC's Emissions (lb/hr)	Potential VOC's Emissions (T/yr)
Door Coating Line	72.0	315.4
Moulding Coating Line	332.4	1455.9
Total Facility-Wide	379.2	1660.8

APPENDIX B
HAP POTENTIAL TO EMIT

Emissions Calculation

Point Description	Process Material	Actual Throughput	Units	Emission Factor	Emission Factor Units	Pollutant	Emissions	Units	Emission Factor Reference
Door Coating Line	Basecoat	15.00	gal/hr	0.236	weight fraction lb/lb	toluene	135.98	tpy	MSDS
Door Coating Line	Basecoat	15.00	gal/hr	0.088	weight fraction lb/lb	methyl ethyl ketone	50.7	tpy	MSDS
Door Coating Line	Basecoat	15.00	gal/hr	0.015	weight fraction lb/lb	methyl isobutyl ketone	8.64	tpy	MSDS
Door Coating Line	Basecoat	15.00	gal/hr	0.015	weight fraction lb/lb	methanol	8.64	tpy	MSDS
Moulding Coating Line	Basecoat	13.75	gal/hr	0.186	weight fraction lb/lb	toluene	121.43	tpy	MSDS
Moulding Coating Line	Basecoat	13.75	gal/hr	0.08	weight fraction lb/lb	methyl ethyl ketone	52.23	tpy	MSDS
Moulding Coating Line	Basecoat	13.75	gal/hr	0.021	weight fraction lb/lb	xylene	13.71	tpy	MSDS
Roll Coater #1	Sealer	5.00	gal/hr	0.308	weight fraction lb/lb	toluene	63.2	tpy	MSDS
Roll Coater #1	Sealer	5.00	gal/hr	0.135	weight fraction lb/lb	methyl ethyl ketone	27.7	tpy	MSDS
Roll Coater #2	Sealer	5.00	gal/hr	0.308	weight fraction lb/lb	toluene	63.2	tpy	MSDS
Roll Coater #2	Sealer	5.00	gal/hr	0.135	weight fraction lb/lb	methyl ethyl ketone	27.7	tpy	MSDS
Fan Coater #1	Basecoat	13.75	gal/hr	0.219	weight fraction lb/lb	toluene	130.44	tpy	MSDS
Fan Coater #1	Basecoat	13.75	gal/hr	0.091	weight fraction lb/lb	methyl ethyl ketone	54.2	tpy	MSDS
Fan Coater #1	Basecoat	13.75	gal/hr	0.024	weight fraction lb/lb	xylene	14.3	tpy	MSDS
Fan Coater #3	Basecoat	13.75	gal/hr	0.2	weight fraction lb/lb	toluene	109.61	tpy	MSDS
Fan Coater #3	Basecoat	13.75	gal/hr	0.1	weight fraction lb/lb	methyl ethyl ketone	54.8	tpy	MSDS
Fan Coater #3	Basecoat	13.75	gal/hr	0.01	weight fraction lb/lb	methanol	5.48	tpy	MSDS
Fan Coater #2	Lacquer	6.25	gal/hr	0.5	weight fraction lb/lb	methyl ethyl ketone	101.01	tpy	MSDS
Fan Coater #2	Lacquer	6.25	gal/hr	0.1	weight fraction lb/lb	toluene	20.2	tpy	MSDS
Printer #1	Ink	6.25	gal/hr	2.21	weight fraction lb/lb	methyl ethyl ketone	60.5	tpy	MSDS
Printer #1	Ink	6.25	gal/hr	0.5	weight fraction lb/lb	toluene	13.69	tpy	MSDS
Printer #1	Ink	6.25	gal/hr	0.11	weight fraction lb/lb	xylene	3.01	tpy	MSDS
Printer #1	Ink	6.25	gal/hr	0.08	weight fraction lb/lb	ethyl benzene	2.19	tpy	MSDS
Printer #2	Ink	6.25	gal/hr	2.21	weight fraction lb/lb	methyl ethyl ketone	60.5	tpy	MSDS
Printer #2	Ink	6.25	gal/hr	0.5	weight fraction lb/lb	toluene	13.69	tpy	MSDS
Printer #2	Ink	6.25	gal/hr	0.11	weight fraction lb/lb	xylene	3.01	tpy	MSDS
Printer #2	Ink	6.25	gal/hr	0.08	weight fraction lb/lb	ethyl benzene	2.19	tpy	MSDS
Total HAP PTE =							1221.95	tpy	

APPENDIX C
RESPONSE TO PUBLIC COMMENTS

**Response to Public Comments
Submitted During the Public Comment Period
for the Teton Sales Co. Tier I Operating Permit
AIRS Facility No. 027-00067**

A public comment period was held from March 21, 2002 through April 22, 2002 to let any interested party review and comment on the draft Tier I operating permit prepared by the Department for the Teton Sales Co. facility. In accordance with IDAPA 58.01.01.364 (*Rules for the Control of Air Pollution in Idaho*), "all Tier I operating permit proceedings shall provide for public notice and public comment, including offering an opportunity for a hearing, on a draft permit or on a draft denial." Copies of the draft permit and technical memorandum were made available at the Caldwell Public Library, the Departments Boise Regional Office, and the Departments state office in Boise. The state of Oregon is an affected state, and as such, the Department is required to provide a copy of the public comment package for their review and comment. Affected states are defined in IDAPA 58.01.01.008.01 as: "All states whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho or that are within 50 miles of the Tier I source."

The only party that provided comments during the public comment period was EPA Region 10. This document provides the Departments response to the comments submitted. Each comment is listed with the Departments response immediately following.

EPA Comments on Draft Permit No. 027-0067

Comment No. 1

Condition 3.2: Filter System Pressure Drop

The permit should specify the appropriate range of pressure drop for the control device. You may also want to consider the kind of monitoring for paint booths used by SCAPCA in their Huntwood Industries permit (see http://www.scapca.org/aop_permit.html) or PSCAA's Ball Metal permit (see <http://psccleanair.org/news/titlev.shtml>).

Response to Comment No. 1

The Department has incorporated additional pressure drop operating requirements as requested by EPA. The following provisions of the permit are provided as the Departments response.

3.2 Filtration System Pressure Drop Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, pressure drop monitoring equipment to continuously measure the pressure differential across the door-coating spray booth filtration system. The pressure differential shall be recorded once per day while the spray paint booth is operating normally. Records of the pressure differential shall remain onsite for the most recent five-year period, and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322.06, 5/1/94]

3.3 Filtration System Particulate Matter Filters

The particulate matter filters used in the door-coating spray booth filtration system shall have a minimum capture efficiency of 99%.

[IDAPA 58.01.01.322.01, 3/19/99]

3.4 Spray Booth Filtration System Pressure Drop Operating Range

The permittee shall determine the appropriate pressure drop operating range for the spray booth filtration system based on the systems physical characteristics, the air flow rate through the system, and the particulate matter filter manufacturer specifications and recommendations. These data shall be incorporated into the O&M manual required by Permit Condition 3.7. The pressure drop across the filtration system shall be maintained with this range when in operation.

Upon issuance of modified Tier I operating permit resulting from the Compliance Schedule pursuant to Permit Condition 7, the specific pressure drop operating range shall be incorporated into the modified permit as a federally enforceable permit condition.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

3.7 Operations and Maintenance Manual Requirements

Within 60 days after the issue date of this permit, the permittee shall have developed an O&M manual for the door-coating spray booth particulate matter filtration system that describes the procedures that will be followed to comply with Permit Condition 3.4 and 3.5. The O&M manual shall include, but not be limited to, the following:

- a general description of the spray booth and its ventilation system
- normal operating conditions and procedures
- the appropriate pressure drop operating range as determined by Permit Condition 3.4
- particulate matter filter manufacturer documentation verifying a minimum capture efficiency of 99%
- maintenance procedures
- corrective action procedures

Particulate matter filter vendor documentation shall be kept with and shall be a part of the O&M manual. The O&M manual shall remain onsite at all times and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.322.01, 5/1/94]

Comment No. 2

Condition 3.5: Visible Emissions

Why specify quarterly monitoring for the door coating operations when the facility wide monitoring is monthly?

Response to Comment No. 2

Permit Condition 3.5 in the draft permit has been rearranged within the body of the permit to accomodate additional requirements and is not Permit Condition 3.8. The monitoring frequency has been changed to monthly to be consistent with the facility-wide permit conditions.

Comment No. 3

Conditions 7.1 through 7.3: Compliance Schedule

Please delete the phrase "or such other time as determined by the Department in writing unless a different time period is specified in writing by the Department." This is too open-ended. Also, please not that the milestones in the statement of basis differ from those in the permit. This should be reconciled.

Response to Comment No. 3

The compliance schedule has been entirely rewritten. The new version does not contain the open-ended statement EPA refers to in this comment. The statement of basis has also been changed to reflect the permit condition.

Comment No. 4

Condition 8: Insignificant Activities

I do not understand the listing of insignificant activities "to qualify for a permit shield." I will call to discuss this with you.

Response to Comment No. 4

Listing insignificant activities in the permit to qualify for a permit shield is an agreed upon procedure between the Department and those industry personnel that participated in the Title V Pilot Operating Permit negotiations.

Comment No. 5

Condition 20.1: Compliance Schedule

I suggest you add a parenthetical to link this section to section 7 – e.g., (see Section 7).

Response to Comment No. 5

A parenthetical has been added to General Provision 20.a [20.1] linking it to Section 7.

EPA Comments on Statement of Basis

Comment No. 6

4.4: Permitting History

At the end of this section, direct the reader to the discussion of the compliance schedule in section 10. This could be done by adding the sentence: "See section 10 for discussion of the compliance schedule for this source."

Response to Comment No. 6

EPA's suggested sentence has been added at the end of section 4.4.

Comment No. 7

As written, this section could be read to imply that the source will be in compliance with the permit to construct requirements once the title V permit is issued because the source is subject to a compliance schedule. As you know, the source remains in noncompliance until the appropriate permits are obtained and the source is in compliance with all permit requirements. Also, this section also implies that no enforcement action was taken or is needed, again, because of the compliance schedule. Of course, the steps needed to come into compliance and the appropriate response for past noncompliance are separate issues. To address these concerns, I suggest the following rewrite:

DEQ has determined that the facility can be brought into compliance with the PTC issues listed above through the issuance of a Tier II OP that establishes enforceable limits and operational parameters that, when met, assure compliance with all applicable air quality rules and regulations. The Tier II OP will not be issued prior to issuance of the Tier I OP. Therefore, a compliance schedule has been developed, as required by IDAPA 58.01.01.314.10.iv.

DEQ has determined that the facility can be brought into compliance with the PSD issued listed above through the issuance of permits in accordance with IDAPA 58.01.01.205, and 40 CFR 52.21. The PSD permit will not be issued prior to issuance of the Tier I OP. Therefore, a compliance schedule has been developed, as required by IDAPA 58.09[01].01.314.10.iv.

Please note that EPA is unclear if IDEQ has adequate authority under the Tier II permit program to address all NSR noncompliance issues (in particular, federal PSD). Also, it is not clear if you intend to use the Tier II permit to create limits on potential to emit in lieu of PSD permitting. In the absence of compelling circumstances, it is EPA's position that, in the case of a source that failed to obtain any type of permit at the time of construction, the source should not be allowed to avoid installation of control technology by obtaining a synthetic minor limit on potential to emit. Please refer to Guidance on Appropriate Injunctive Relief for Violation of Major New Source Review Requirements, dated November 17, 1998 for a discussion of EPA's policy on this issue.

Also, section 10.2 should be renamed Compliance Schedule and combined with section 10.3. The part 70 rules direct the source to submit a compliance *plan* and the permitting authority to incorporate a compliance *schedule* into the permit. Although Idaho's rules initially referred to DEQ developing a compliance plan and a compliance schedule, Idaho has revised its rules so that, like part 70, the source is required to develop and submit a compliance plan and the permitting authority is required to include a compliance schedule, based on the compliance plan, into the permit. This is a minor point.

Response to Comment No. 7

The language in the statement of basis has been changed to address EPA's PSD concern. The following is that discussion as presented in the statement of basis.

Teton Sales is out of compliance because they failed to obtain a PTC prior to construction or modification of these sources. The DEQ, however, has determined Teton Sales can be brought into compliance with the applicable PTC requirements, including PSD permitting requirements, through the issuance of a Tier II operating permit that establishes enforceable limits and operational parameters that, when met, assure compliance with all applicable air quality rules and regulations. The Tier II operating permit will not be issued prior to issuance of the Tier I permit; therefore, a compliance schedule has been developed as required by IDAPA 58.01.01.314.10.iv. To review Teton Sales compliance schedule, see Permit Condition 7.

In their review of Teton Sales draft Tier I operating permit, EPA raised concern about creating limits on potential to emit in a Tier II operating permit in lieu of PSD permitting. EPA's primary

concern is that a source subject to PSD may be allowed to avoid installing control technology simply by obtaining a synthetic minor limit on potential to emit.

As part of the compliance schedule requirements listed in Permit Condition 7, Teton Sales is required to include with their facility-wide Tier II operating permit application, information necessary to address all applicable PTC requirements, including PSD requirements. Idaho's PTC regulations, which include PSD review, are SIP-approved. By requiring that Teton Sales address noncompliance issues under these federally-approved and federally-enforceable regulations assures that any resulting requirements incorporated into a Tier II operating permit are also federally enforceable.

Comment No. 8

10.3.2 Obtain Tier II Operating Permit

Delete the phrase "or such time as approved by DEQ in writing." This is too open ended.

Response to Comment No. 8

Section 10.3.2 as reference above no longer exists. Please see Response to Comment No. 7 for the language contained in section 10 of the statement of basis.

Comment No. 9

10.3.3 Obtain Modified Tier I Operating Permit No. 027-00067

Please delete the phrase "or such time as approved by DEQ in writing." This is too open ended. Also, please note that the milestones in the statement of basis differ from those in the permit. This should be reconciled.

Response to Comment No. 9

Section 10.3.3 as reference above no longer exists. Please see Response to Comment No. 7 for the language contained in section 10 of the statement of basis.

End of comments.